## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	) Bankruptcy No. 15-20632 GLT
Eve F. Beahm,	)
Debtor,	) Chapter 13
PNC Bank, National Association	)
Movant,	) Related Claim No. 5
vs.	)
Eve F. Beahm,	)
Respondent.	) Document No.

## DECLARATION THAT THE EXISTING CHAPTER 13 PLAN IS SUFFICIENT

**AND NOW,** comes the Debtor, Eve F. Beahm, by and through her attorneys, CALAIARO VALENCIK and David Z. Valencik, and presents the following:

- 1. This case was originally filed on February 26, 2015.
- 2. A notice of mortgage payment change was filed on November 2, 2017, change the Debtors Mortgage payment to \$627.18.
- 3. The Debtor's Amended Plan dated September 7, 2017 provides for a payment in the amount of \$644.06
  - 4. There is no reason to amend the Debtor's Chapter 13 Plan.

## Respectfully submitted,

DATED: November 22, 2017

BY:/s/ David Z. Valencik

Donald R. Calaiaro, Esquire, PA I.D. #27538

dcalaiaro@c-vlaw.com

David Z. Valencik, Esquire, PA I.D. #308361

dvalencik@c-vlaw.com CALAIARO VALENCIK 428 Forbes Avenue, Suite 900 Pittsburgh, PA 15219-1621 (412) 232-0930